



Network Rail

# Modern Slavery Statement

2022 – 2023 Financial Year

## **Introduction**

This is our annual statement to show the steps we've taken to manage the risk of modern slavery occurring within our organisation or supply chain. It covers the 2022/23 financial year and takes us up to 31 March 2023.

The statement has been broken down into the following sections:

1. Structure, Business & Supply Chains
2. Policies
3. Risk Assessment, Prevention & Mitigation
4. Due Diligence Processes
5. Training & Awareness
6. Effectiveness
7. Looking Forward

### **1. Structure, Business & Supply Chains**

Our purpose is to get people and goods where they need to be and to support our country's economic prosperity. In order to do this, we own and operate Britain's railway infrastructure and work with an extensive supply chain. More information on our organisational structure can be found [here](#).

**Our Business in Figures:**



**40,237 Employees**



**20,000 Miles of Track**



**30,000 Bridges,  
Tunnels & Viaducts**



**20 Managed Stations**



**£8.5 Billion Supply  
Chain Spend Per Year**



**>96% British Suppliers  
or British Subsidiaries**



**4,130 Total Number  
of Suppliers**



**3107 (75%) Number of  
Small & Medium Sized  
Enterprises (SMEs)**



Our supply chain plays a huge part in helping us run a safe and efficient railway. We're dependent on our suppliers to help us deliver rail services across Britain including thousands of small & medium sized enterprises (SMEs) who supply us with vital services ranging from track equipment to drone technology. 96 % of our suppliers are British based companies or subsidiaries and are managed by our Commercial & Procurement (C&P) professionals.

We regularly collaborate with our industry partners to share best practice and tackle wider issues. Currently, we're members of the Department for Transport (DfT) and Rail Safety and Standards Board (RSSB) modern slavery working groups. We've also worked with Hestia, a London based charity that supports vulnerable people including victims of modern slavery, and have continued our membership with Slave Free Alliance, an anti-slavery enterprise – part of the Hope for Justice Charity, who support us by providing subject matter expert advice and resource.

Responsibility for our modern slavery policy and programme sits with our group general counsel, reporting directly into the chief financial officer, who sits on the Board of Directors.

Throughout the statement, 'we' and 'Network Rail' refers to:

- Network Rail Infrastructure Limited (NRIL)
- Network Rail (High Speed) Limited - a subsidiary of NRIL that works with HS1 Limited
- Network Rail International Limited – a consulting subsidiary of NRIL that shares expertise with rail owners and operators

## **2. Policies**

We have several policies that help us manage our modern slavery risk. They enable us and our suppliers to have a joined-up approach in tackling the threat of modern slavery and help us to understand our responsibilities when responding to issues or concerns.

We regularly seek advice from third parties on the effectiveness of our policies and have worked with PROTECT and Slave Free Alliance in recent years to benchmark against best practice and gain independent assurance.

Staff can access our policies on our intranet site or through an internal app called 'EthicsApp', which is available on all work mobile devices as standard. They can also be found on our [external website](#) for our customers and suppliers

Our key policies in relation to preventing and reporting modern slavery are:

### **Anti-Slavery and Human Trafficking policy**

The latest version of this policy was published in May 2020 and includes information on what modern slavery is, our commitments as an employer, our expectations of any third parties we work with, the warning signs to look out for, and how to report concerns.

### **Code of Business Ethics**

Our Code of Business Ethics sets out the standard of behaviour expected of our staff, contractors, and suppliers. It has a section dedicated to modern slavery which includes information about our commitment to act responsibly, how to spot the signs of potential victims, and how to raise concerns.

### **Commercial Policies**

Our Commercial & Procurement policy, as well as our Procurement Management Framework and Commercial Management Framework, include references to Modern Slavery throughout. Additionally, our Supplier Code of Conduct reminds our suppliers of the need to comply with the Modern Slavery Act.

### **Speak Out policy (whistleblowing)**

Our recently refreshed Speak Out policy confirms that anyone can raise concerns about wrongdoing, including instances of modern slavery, taking place in Network Rail. We offer various channels for people to raise concerns – including a confidential 24/7 reporting service called ‘Speak Out’ which allows for reports to be made anonymously and contains a specific ‘modern slavery’ category.

## **3. Risk Assessment, Prevention & Mitigation**

This year we’ve continued to focus our efforts on reducing the potential for modern slavery within the 5 high risk procurement categories identified as part of a risk assessment undertaken by Slave Free Alliance. Their assessment looked at our procurement categories and identified where risk could exist combined with how much leverage we had over each category’s industry and supply chain.

The five high risk categories identified are:

- **Contingent Labour** – temporary labour working on the railway under our direction
- **Facilities (Soft Services)** – office and station services including waste management, cleaning, and catering
- **General Civils** – infrastructure construction other than station redevelopments
- **Infrastructure Support Services** – support services for our infrastructure maintenance including track and vegetation clearance
- **Track** – track renewal projects and associated maintenance services

As we own some of the largest stations across the UK, we also have a responsibility to ensure that our public facing spaces are safe and tackle the challenges facing those that may travel through and use our services. For this reason, we partnered with the charity Shelter to design an outreach service tailored to respond to the specific needs of station staff and those sleeping rough in and around the stations. The scheme covers Birmingham New Street, Manchester Piccadilly, London Victoria, and London Charing Cross stations. Whilst the scheme is tackling the much broader topic of homelessness,

we're aware of the potential overlap with victims of modern slavery and see this as a valuable way to directly reach those that may need help. Moving forward, we've built a KPI into Shelter's service contract to ensure that any suspected instances of modern slavery are flagged to us. This will help us in understanding our station risk landscape and allow us to consider new ways of tackling the issue within our stations.

#### **4. Due Diligence Processes**

For high-value procurement activities a competitive tender process is required. This includes the use of a Pre-Qualification Questionnaire (PQQ) and further questions at the Invitation to Tender (ITT) stage. All PQQ's contain modern slavery questions as standard with high-risk commercial exercises requiring additional controls to be put in place.

Internal assessments are carried out to understand which procurement events fall into the high-risk categories, and additional questions can be included within ITTs to understand how a supplier intends to manage any modern slavery risks within their supply chain over the life of the contract.

Any supplier that falls into a high-risk category and exceeds the contract cost threshold of £50m will also be asked to submit a Modern Slavery Assessment Tool (MSAT) response. The MSAT is an industry-wide tool, created by the Cabinet Office, that provides us with a risk rating for the supplier in question and accompanying improvement actions for how the rating can be upgraded moving forward. The feedback will form part of our post contract management plan with suppliers and will ensure that, as an industry, we can continue to share knowledge and push for sector-wide continuous improvement.

We started to trial the MSAT last year, asking 20 suppliers to provide a submission. We've since received 11 responses, including submissions from some of our largest contingent labour providers, and will continue to embed this as a control within our post-contract processes. Moving forward we'll push to meet our target to have MSAT responses in place for any supplier with a contract worth over £50 million that falls within our medium or high-risk categories.

This year, our facilities management contract came up for renewal, which allowed us to put our controls into practice on one of our most high-risk tender exercises. Both PQQ and ITT questions were utilised, with the Ethics team supporting on scoring the supplier submissions. An MSAT submission request was then issued to the successful providers with the relevant responses now received.

Finally, we utilise approved supplier assurance providers including the Rail Industry Supplier Qualification Scheme (RISQS), owned by the Rail Safety and Standards Board (RSSB), to provide us with independent assurance of our immediate supplier compliance.

## 5. Training & Awareness

Modern Slavery training is included as part of our ethical training course which all employees must complete every three years. Completing this training gives our staff a good understanding of what Modern Slavery is and how they can report concerns.

This year, one of our aims was to produce an additional training package aimed at our Commercial colleagues, to support them in understanding the risk of modern slavery in the supply chain and how that risk can be mitigated in their procurement exercises through due diligence, contractual terms, and supplier management. Whilst the training package isn't yet in use, discussions are underway with Slave Free Alliance about how they can support us, with the current plan being to have them deliver face to face training to our practitioners managing high risk procurement exercises.

Alongside our training we produced multiple communication campaigns this year. The first was a refresher campaign aimed at highlighting the importance of spotting the signs of modern slavery. The campaign used existing imagery and was timed to coincide with the BBC documentary *The Real Mo Farah* which highlighted the very real threat of modern slavery within the UK and the need to spot the signs.

We launched our second campaign on anti-slavery day, in collaboration with London based charity Hestia. Station concourse space at both London Bridge and Waterloo stations was used to host an art exhibition. The artwork on display consisted of paintings, photography, and poetry produced by Hestia's clients, who are all previous victims of modern slavery. Key members of both organisations attended the exhibition to mark anti-slavery day including our chair, Peter, Lord Hendy of Richmond Hill and Hestia's chair of trustees, Terrie Alafat CBE. The exhibition remained in place for a month and was posted internally on our intranet pages and staff publication, *Network Magazine*, as well as being posted publicly through our twitter account and being enjoyed in person by thousands of passengers.



*Hestia's chair of trustees, Terrie Alafat CBE (middle left) and Network Rail's chair, Peter (middle right) meeting with Network Rail volunteers at the London Bridge Art is Freedom exhibition space during Anti-Slavery Week*

Our final campaign this year saw us change focus and talk to potential victims directly; something we haven't done previously. Materials were produced to help potential victims identify key signs of slavery and signpost them to support through our Speak Out mechanism or, in emergencies, 999. The wording was purposefully simple, avoided the term 'modern slavery', and was translated into some of the most commonly spoken foreign languages within the construction sector. Alongside the communications package we produced an accompanying remediation plan for our operational sites. The plan, and associated training and guidance, is set to be rolled out alongside the campaign throughout the new financial year and will be embedded into site safety packs when they're refreshed in 2023/24.



*Example of victim-centric operational comms produced this year*

## 6. Effectiveness

We recognise that our modern slavery policy and strategy can only be effective if we educate our staff and we're pleased to report that 87 % of our entire workforce has completed our ethics training. We also feel it's important to communicate with our supply chain successfully. For this reason, our group commercial and procurement director made a point of writing to our supplier base to raise awareness of our Speak Out platform and the importance of raising concerns relating to human rights violations and instances of modern slavery.

We also monitor and categorise all concerns reported to us. Whilst we've received and investigated some concerns in relation to operational environments and conditions, we haven't found any conclusive evidence of modern slavery taking place on our sites within the last year.

Regular updates on our current risk landscape and the effectiveness of what we're doing to reduce the threat of modern slavery are monitored through quarterly risk meetings and our working group. These discussions give us opportunities to share best practice and escalate concerns or delays in improvement actions up to senior leaders.

This year also saw us achieve an ISO37001 certification in relation to anti-bribery controls. Whilst the certification predominantly covers the topic of bribery, our modern slavery preventative measures were considered as part of the review due to the potential for the two subjects to overlap, with the auditors finding “increasingly robust processes in place to demonstrate compliance with the requirement of ISO37001:2016”.

## **7. Looking Forward**

We look forward to making further business improvements over the next financial year. Our aim is to continue working closely with Slave Free Alliance, Hestia, Shelter, and our industry working groups to improve our internal processes and controls as well as our external facing schemes. Some of the actions include:

- Finalising our bespoke training package including accompanying guidance and supporting tools for Commercial & Procurement colleagues involved in high-risk procurement exercises
- Embedding our modern slavery remediation plan and associated guidance into operational site safety packs
- Continuing to embed the MSAT work stream; making sure high-risk suppliers are obligated to complete a submission and our Commercial colleagues are comfortable in using the responses as part of their post contract management
- Continuing to recognise Anti-Slavery Day and expanding our support for the Art is Freedom exhibition across more stations

We remain committed to continuously improving what we do in this area to reduce the risk of modern slavery and we'll report back next year on our further progress.

This statement was approved by:

- the Board of Network Rail Infrastructure Limited on 21 Sept 2023
- the Board of Network Rail International Limited on 05 July 2023
- the Board of Network Rail (High Speed) Limited on 14 July 2023

Signed by



**Peter, Lord Hendy of Richmond Hill**  
**Chair**  
**21 September 2023**